

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARRAY BIOPHARMA INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 22-1277-GBW
	:	CONSOLIDATED
ALEMBIC PHARMACEUTICALS	:	
LIMITED and SANDOZ, INC.,	:	
	:	
Defendants.	:	

**DEFENDANT SANDOZ INC.’S UNOPPOSED MOTION FOR EXEMPTION
FROM THE DISTRICT OF DELAWARE’S MAY 15, 2023
STANDING ORDER ON PERSONAL DEVICES**

Defendant Sandoz Inc. (“Sandoz”) moves for an order to exempt Fahd Majiduddin from the District of Delaware’s May 15, 2023 Standing Order on Procedures Regarding the Possession and Use of Cameras and Personal Electronic Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse (the “May 15, 2023 Standing Order”). In support of this Motion, Sandoz states as follows:

1. The District of Delaware’s May 15, 2023 Standing Order provides procedures to regulate the possession and use of personal electronic devices by visitors to the J. Caleb Boggs Federal Building and United States Courthouse, which require *inter alia*, for visitors to place personal electronic devices in a locked pouch provided by U.S. Marshals. Paragraph 4 of the May 15, 2023 Standing Order provides for certain exemptions to the Standing Order.

2. A *Markman* hearing in this action is scheduled for February 15, 2024.

3. Mr. Majiduddin is Senior IP Counsel, Litigation, for Sandoz. He intends to appear at the *Markman* hearing on February 15, 2024, and requests access to his electronic devices to

communicate with Sandoz employees and possibly those members of Crowell & Moring LLP, Sandoz's lead trial counsel, who are not in attendance at the hearing. However, Mr. Majiduddin does not have a state-issued bar card to meet the exemption listed in Paragraph 4 of the May 15, 2023 Standing Order.

4. This motion is unopposed.

WHEREFORE, Sandoz respectfully requests that the Court issue an order, in the form attached hereto, to exempt Fahd Majiduddin from the District of Delaware's May 15, 2023 Standing Order.

OF COUNSEL:

Mark H. Remus
Laura A. Lydigsen
Adam Sussman, Ph.D.
Judy K. He
Andrew Spitzer
CROWELL & MORING LLP
455 North Cityfront Plaza Drive, Suite 3600
Chicago, Illinois 60611-5599

HEYMAN ENERIO
GATTUSO & HIRZEL LLP

/s/ Dominick T. Gattuso
Dominick T. Gattuso (# 3630)
300 Delaware Avenue, Suite 200
Wilmington, DE 19801
dgattuso@hegh.law
Phone (302) 472-7300

Attorneys for Defendant Sandoz Inc.

Dated: February 13, 2024